

**Comments and Responses to the November 19, 2004  
Tentative Order No. R9-2004-0409, Waste Discharge Requirements for the Ramona Unified School District, Hanson  
Elementary School, San Diego County**

The Regional Water Quality Control Board, San Diego Region (Regional Board) issued Tentative Order No. R9-2004-0409 on November 19, 2004 for public comment. Written comments were received until close of business, December 1, 2004. This document is the Regional Board's response to comments received.

Comment	Response
<b>Comments received from John C. Lemmo, Foley and Lardner, LLP (letter dated November 29, 2004)</b>	
<p>1. Please change Finding No. 1 as follows:</p> <p>On June 3, 2004, the Ramona Unified School District (hereinafter discharger) submitted to this Regional Board <del>an incomplete</del> <u>a</u> Report of Waste Discharge for the treatment of domestic wastewater generated at the newly constructed Hanson Elementary School on Boundary Avenue in Ramona. The discharger submitted <del>a complete Report of Waste Discharge</del> <u>additional information at the request of Regional Board staff</u> on September 2, 2004.</p>	<ul style="list-style-type: none"> <li>• The Finding has been changed. (See Errata Sheet Item No. 1)</li> </ul>
<p>2. We wish to modify the condition concerning the operations and maintenance (O&amp;M) manual to require its submission within 45 days after commencement of the discharge, rather than prior to commencement. This is because we would like to be certain as to what the final Order requires before we create the O&amp;M manual. We would also like to be able to operate the system while preparing the manual.</p>	<ul style="list-style-type: none"> <li>• The proposed language in Facility Design and Operation Specifications C.2 has been changed. (See Errata Sheet Item Nos. 6 and 8)</li> </ul>

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<p>3. Please replace all references to “irrigation” with “dispersal”. The Hanson Elementary School system does not dispose of treated effluent by irrigation....The dispersal system is not designed, as irrigation would be, to provide water at rates suitable for plant growth.</p>	<ul style="list-style-type: none"> <li>The language has been changed as requested. (See Errata Sheet Item Nos. 2 and 7)</li> </ul>
<p>4. Please change Finding No. 4 as follows:</p> <p>The discharger has indicated that the subsurface drip disposal system is designed with the capability to rotate disposal zones as needed. This procedure will ensure even distribution of wastewater throughout the <del>leach</del> <u>disposal</u> field and avoid over saturation of a particular area. The effluent is <del>dispersed from</del> <u>distributed to</u> the subsurface emitters via pressure <u>and drips by gravity once exiting the emitters.</u></p>	<ul style="list-style-type: none"> <li>The Finding has been changed. (See Errata Sheet Item No. 3)</li> </ul>
<p>5. Please change Finding No. 15 as follows:</p> <p>The discharger has indicated that it <del>will</del> <u>has</u> <u>contracted</u> <u>for</u> the daily operations and maintenance of the treatment facility with an outside contractor with extensive experience in onsite wastewater systems and operators that are certified in wastewater <del>treatment</del> <u>treatment.</u></p>	<ul style="list-style-type: none"> <li>The Finding has been changed. (See Errata Sheet Item No. 5)</li> </ul>

Comment	Response
<b>Comments received from Charles W. Apgar (letter dated November 29, 2004)</b>	
<p>6. The potential environmental noise and odor pollution from the dosing tank located on the northernmost property boundary constitutes a nuisance. That dosing tank has a number of blowers to exhaust odor from it and the system calls for these blowers to run 24 hours. The noise and odor level is undetermined at this point. Since my residence is directly across Boundary Ave. from the tank, I wish to be assured the noise and odor from the 24 hour blowers will not disturb our quality of life.</p>	<ul style="list-style-type: none"> <li>Prohibition A.3 of the tentative Order states: “Neither the treatment, storage nor disposal of waste shall create a pollution, contamination or nuisance, as defined by Section 13050 of the California Water Code.” The Regional Board reserves the right to take enforcement action if the treatment and disposal system violates this prohibition.</li> </ul>
<p>7. The parcel is 52.45 acres – not 54 acres. Since the Mitigated Negative Declaration covered 40% of the northernmost part of the parcel, or 20.98 acres – not 24.1 acres. Therefore, the disposal field is outside the 20.98 and not covered by the environmental document. I believe it is the responsibility of the RWQCB to require the discharger to disprove this claim.</p> <p>40% of 52.45 acres = 20.98 acres 40% of 54 acres = 21.60 acres</p>	<ul style="list-style-type: none"> <li>The Mitigated Negative Declaration document for the project, dated October 2000, refers to a project size of “approximately 52 acres”. The Regional Board considers this minor discrepancy in site size as immaterial to the wastewater treatment and disposal system and has no impact on the proposed requirements.</li> </ul>
<p>8. The negative declaration was not distributed through the State Clearing House, therefore not all agencies were able to comment on it, including the RWQCB.</p>	<ul style="list-style-type: none"> <li>John C. Lemmo, counsel for the discharger, disputes this claim and has indicated that the CEQA process was completed properly.</li> </ul>

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9. In item 18 on page 5 of the tentative order, it states a public meeting was held. When? Where?	<ul style="list-style-type: none"> <li>The public meeting referred to in the Finding is the December 8, 2004 meeting to be held at the San Diego Regional Water Quality Control Board.</li> </ul>
10 In item 7 on page 6, who monitors this effluent flow and where are the public records maintained?	<ul style="list-style-type: none"> <li>The Ramona Unified School District (RUSD) has informed the Regional Board that they will contract daily operations and maintenance of the treatment facility, including monitoring, with an outside contractor that has extensive experience in onsite wastewater systems and operators that are certified in wastewater treatment.</li> <li>The public records regarding this tentative Order, including monitoring reports, are maintained at the San Diego Regional Water Quality Control Board.</li> </ul>
11. In item 2 on page 6 of the order, who checks this requirement and reports to whom?	<ul style="list-style-type: none"> <li>The RUSD is responsible for the maintenance of the facilities.</li> <li>All monitoring reports are submitted to the San Diego Regional Water Quality Control Board since it is the regulatory agency that issued the Waste Discharge Requirements. Other public agencies may be notified or involved on a situational basis.</li> </ul>

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12. In item 14 on page 14, change of discharge, point d increase in flow: see attached Luisa Parks letter of Nov. 2000, that the parcel is to contain a middle school.	<ul style="list-style-type: none"> <li>• If the RUSD wishes to increase the permitted flow rate as limited by Prohibition A.7, then the discharger must file a new Report of Waste Discharge as specified in Standard Provision E.14. Discharges in excess of 3,645 gallons over any 24-hour period would be in violation of the tentative Order.</li> </ul>
13. This parcel is under lease to the construction firm building the school.	<ul style="list-style-type: none"> <li>• Comment noted.</li> </ul>
14. In item F on page 25, will the monitoring wells plan be made available to area residents who rely exclusively on ground water before the plan is accepted? Plan should include data from monitoring wells be accessible to residents around the Hanson School parcel.	<ul style="list-style-type: none"> <li>• Documents submitted to the Regional Board are public record and are available for public review by appointment. The RUSD may provide a copy of the proposed monitoring well plan to interested parties upon request.</li> </ul>
15. Has the tentative order been amended since its Nov. 19, 2004 issuance?	<ul style="list-style-type: none"> <li>• See Errata Sheet for proposed changes.</li> </ul>